

1 ANDRÉ BIROTTE JR.
2 United States Attorney
3 SANDRA R. BROWN
4 Assistant United States Attorney
5 Chief, Tax Division
6 DANIEL LAYTON (SBN 240763)
7 Assistant United States Attorney
8 Room 7211, Federal Building
9 300 North Los Angeles Street
10 Los Angeles, CA 90012
11 Telephone: (213) 894-6165
12 Facsimile: (213) 894-0115

13 Attorneys for the United States of America

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16 SOUTHERN DIVISION

17 UNITED STATES OF AMERICA,) Case No. SACV12-930-DOC (MLGx)
18 Plaintiff,)
19 vs.) STIPULATION TO EXTEND TIME
20 NAGESH SHETTY, et al.,) FOR DEFENDANT RICHARD
21 Defendants.) D'SOUZA, a.k.a. RICHARD
) D'SOUSA or RICHARD DE SOUZA,
) TO RESPOND TO INITIAL
) COMPLAINT BY NOT MORE THAN
) 30 DAYS (L.R. 8-3)
)
) Complaint Served: 10/3/2012
) Current Resp. Due: 10/24/2012
) New Resp. Due: 11/23/2012
)
) No Order Necessary

22
23
24 Plaintiff United States of America and defendant RICHARD D'SOUZA,
25 a.k.a. RICHARD D'SOUSA or RICHARD DE SOUZA, stipulate as follows:

26 1. On June 11, 2012, plaintiff filed its COMPLAINT (1) TO REDUCE
27 JOINT FEDERAL TAX ASSESSMENTS TO JUDGMENT; (2) FOR A
28 DETERMINATION THAT REAL PROPERTY IS TITLED TO RICHARD

1 D'SOUZA AS NOMINEE OR IN RESULTING TRUST FOR THE BENEFIT OF
2 NAGESH SHETTY AND ANITA SHETTY; (3) TO SET ASIDE FRAUDULENT
3 TRANSFER OF REAL PROPERTY FROM NAGESH SHETTY AND ANITA
4 SHETTY TO RICHARD D'SOUZA; and (4) TO FORECLOSE FEDERAL TAX
5 LIENS ON REAL PROPERTIES (hereinafter "complaint").

6 2. On October 3, 2012, copies of the complaint and summons were
7 served upon defendant RICHARD D'SOUZA, a.k.a. RICHARD D'SOUSA or
8 RICHARD DE SOUZA.

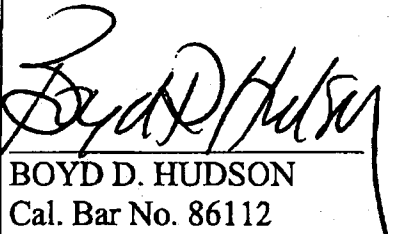
9 3. The undersigned parties agree that defendant RICHARD D'SOUZA,
10 a.k.a. RICHARD D'SOUSA or RICHARD DE SOUZA, may have an additional
11 30 days from the last date for filing his answer, October 24, 2012.

12 4. Defendant RICHARD D'SOUZA, a.k.a. RICHARD D'SOUSA or
13 RICHARD DE SOUZA, will have until November 23, 2012, in order to prepare a
14 response to the complaint.

15 **IT IS SO STIPULATED.**

16 Respectfully submitted,

17 ANDRÉ BIROTTE, JR.,
18 United States Attorney
19 SANDRA R. BROWN,
20 Asst. U.S. Attorney, Chief, Tax Division

21 
22 BOYD D. HUDSON
23 Cal. Bar No. 86112
24 Attorney for Defendant
25 Richard D'Souza, a.k.a.
26 Richard D'Sousa or Richard
27 De Souza

DANIEL LAYTON
Assistant United States Attorney
Attorneys for the United States of America

28 Date: October 24, 2012

Date: 10/24/12

PROOF OF SERVICE BY MAILING

I am over the age of 18 and not a party to the within action. I am employed by the Office of the United States Attorney, Central District of California. My business address is 300 North Los Angeles Street, Suite 7211, Los Angeles, California 90012.

On **October 24, 2012**, I served Stipulation to Extend Time for Defendant Richard D'Souza, a.k.a. Richard D'Souza or Richard De Souza, to Respond to Initial Complaint by Not More Than 30 Days on the person and entity name below by enclosing a copy in an envelope addressed as shown below and placing the envelope for collection and mailing on the date and at the place shown below following our ordinary office practices. I am readily familiar with the practice of this office for collection and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

SEE ATTACHED.

Date of mailing: **October 24, 2012**.

Place of mailing: Los Angeles, California

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on: **October 24, 2012**, Los Angeles, California.

MARIA LUISA Q. BULLARD

USA V. NAGESH SHETTY, ET AL
SA CV 12-930 DOC(MLGx)

SERVICE LIST

Boyd D. Hudson, Esq.
251 S. Lake Avenue
Suite 930
Pasadena, CA 91101